

**AFFIDAVIT**

I, Paul Shade, being first duly sworn on oath, state as follows:

**AGENT INTRODUCTION AND BACKGROUND**

1. I am a United States Postal Inspector with the United States Postal Inspection Service, and have been so employed since July, 2004. I am currently assigned to the Kansas City Field Office of the Postal Inspection Service and have experience enforcing federal mail and drug laws. This affidavit is based on my own personal knowledge and information given to me by other Postal Inspectors and other law enforcement personnel.

2. I received basic training for approximately 12 weeks from the United States Postal Inspection Service regarding individuals using the United States Mail to transport controlled substances and proceeds from the sale of controlled substances as well as the use of Postal Money Orders to launder the proceeds of controlled substances. I received formal training for one week in January, 2009, when I attended the United States Postal Inspection Service Narcotics training course in Potomac, Maryland. This training involved drug trafficking investigation techniques, chemical field testing, and training in the identification and detection of controlled substances and illicit drug proceeds being transported in the United States Mail and other commercial carriers.

3. The U.S. Postal Inspection Service has implemented a parcel profile program targeting parcels mailed to and from areas of the United States which have been identified by law enforcement as being source areas for the distribution of controlled substances. The Kansas City Field Office Postal Inspection Service program consists of reviewing postal service records and a

physical profile of Express and Priority Mail parcels and envelopes which have originated from and/or have been received for delivery in the District of Kansas and Western District of Missouri.

**ITEM TO BE SEARCHED AND ITEMS TO BE SEIZED**

4. This affidavit is made in support of an application for a search warrant for a United States Postal Service ("USPS") Priority Express Mail Parcel, bearing tracking number "EI414330113US," addressed to "Jama Din- 2135 Se 122nd Ave #32, Portland, OR 97233" with a return address of "Way Be- 3234 E. 8th St #1e, Kansas City, MO 64124" was mailed on February 7, 2023, from Kansas City, MO Post Office 64127. Further, this parcel weighs approximately 4 pounds 10 ounces and bears \$80.95 in postage ("**Subject Parcel**").

5. Items to be seized from the **Subject Parcel** include controlled substances (specifically, marijuana, cocaine, methamphetamine, and heroin); any drug paraphernalia, and/or currency related to the possession or distribution of a controlled substance including narcotic packaging.

6. The **Subject Parcel** warrant will be executed at the Kansas City Missouri Interdiction Office located at an undisclosed location in Kansas City, Missouri, which is in the Western District of Missouri.

**OFFENSES UNDER INVESTIGATION**

7. Based on my training and experience and on the facts set forth in this Affidavit, I believe the **Subject Parcel** contains evidence of violations of Title 21, United States Code, Section 841(a)(1) (possession with intent to distribute a controlled substance); Title 21, United States Code, Section 843(b) (unlawful use of a communications facility to facilitate the

commission of the above drug trafficking offenses) and Title 21, United States Code, Section 846 (attempts and conspiracies to do the same).

**PROBABLE CAUSE**

8. On February 7, 2023, while examining outgoing mail parcels online, I observed the **Subject Parcel**, bearing tracking "EI414330113US," addressed to "Jama Din- 2135 Se 122nd Ave #32, Portland, OR 97233" with a return address of "Way Be- 3234 E. 8th St #1e, Kansas City, MO 64124" that was mailed on February 7, 2023, from Kansas City, MO Post Office 64127. Further, this parcel weighs approximately 4 pounds 10 ounces and bears \$80.95 in postage ("Subject Parcel").

9. The **Subject Parcel's** postage was paid with cash.

10. I queried the **Subject Parcel's** listed return address information (Way Be- 3234 E. 8th St #1e, Kansas City, MO 64124) in the CLEAR Law Enforcement Database and Be was found at that address. I also queried the addressee information (Jama Din- 2135 Se 122nd Ave #32, Portland, OR 97233) in the CLEAR Law Enforcement Database and Din was identified as being associated to the address.

11. I retrieved the **Subject Parcel** from the Kansas City MO P&DC located at 1700 Cleveland, Kansas City, MO. On February 9, 2023, I contacted Kansas City, Missouri Police Detective Antonio Garcia and coordinated an exterior canine odor search of the **Subject Parcel** at the Postal Inspection Service Office located at 6201 College Blvd #400, Overland Park, KS. Inspectors placed the **Subject Parcel** in the lobby area, where other similar empty boxes were located in the facility. At approximately 9:15 a.m., I observed Detective Garcia and his certified drug detecting canine, Zeus, search the area. I observed Zeus search the area and then sat facing the **Subject Parcel**. Detective Garcia stated Zeus's actions indicated he had alerted to the

**Subject Parcel** as containing a controlled substance odor. Detective Garcia confirmed that Zeus had alerted on the **Subject Parcel** indicating that Zeus had detected the odor of a controlled substance emitting from on or inside the parcel. "Assuming that the dog is reliable, a dog sniff resulting in an alert on a container, car, or other item, standing alone, gives an officer probable cause to believe that there are drugs present." *United States v. Bowman*, 660 F.3d 338, 345 (8th Cir. 2011).

12. According to Detective Garcia, Zeus is a three-year-old, German Shepherd. Zeus's last certification by the National Police Canine Association was on April 12, 2022. Zeus is trained to detect the odors of cocaine, marijuana, heroin, and methamphetamine. Since being certified, Zeus has recovered 12,738.6 pounds of marijuana, 2,682.2 pounds of THC oil, 523.2 pounds of methamphetamine, 2456 tablets ecstasy, 184.7 pounds of cocaine, 54.8 pounds Heroin, 62.7 pounds of Fentanyl, 247,951 Fentanyl tablets, PCP 5 gallons and 2 quarts, and \$2,500,430.00 in US Currency.

13. Based on my training and experience, I know that drug traffickers that utilize the USPS to transport controlled substances via the mail will also commonly include other items or evidence of drug trafficking activities in parcels that contain controlled substances. Those items include drug paraphernalia, drug packaging materials, and currency.

### **CONCLUSION**

13. Therefore, based on these facts, I believe there is probable cause to believe that the **Subject Parcel** contains evidence of a crime, including in violation of Title 21, United States Code, Section 841(a)(1) (possession with intent to distribute a controlled substance); Title 21, United States Code, Section 843(b) (unlawful use of a communications

facility to facilitate the commission of the above narcotics offenses) and Title 21, United States Code, Section 846 (attempts and conspiracies to do the same).

Further, Affiant sayeth not.



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PAUL SHADE  
United States Postal Inspector  
United States Postal Inspection Service

Telephonically  
Sworn to and subscribed before me

on this 13th day of February 2023.



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HONORABLE JILL A. MORRIS  
United States Magistrate Judge   
Western District of Missouri